Pacific Co., 105 Cal., 426. *Contra*: *First National Bank v. McGuire*, 12 S. D., 226.

LIBEL AND SLANDER—WORDS ACTIONABLE—IMPUTING DISQUALIFICATION OF AN ATTORNEY.—MONTGOMERY V. NEW ERA PRINTING CO., 78 ALT., 85.—*Held*, that any oral or written words which impute to an attorney-at-law the want of the requisite qualifications to practice, or with having been guilty of corrupt, dishonest, or improper practice in the performance of his duties as a lawyer, are actionable *per se*.

Any oral or written words, imputing to an attorney-at-law the want of requisite qualifications to practice law, or with having been guilty of corrupt, dishonest, or improper practice as lawyer are actionable *per se*. *Turner v. Hearst*, 115 Cal., 394; *State v. Cooper*, 138 Iowa,, 516. As in imputations affecting professional capacities generally it is essential that the charge should actually touch the attorney in his profession. *Stewart v. Minnesota Tribune Co.*, 40 Minn., 101; *Kirby v. Martindale*, 19 S. D., 394. To thus affect his profession it has been held that the charge need only be *direct* rather than *express*, although a *general* imputation, equally injurious to any one against whom it might be made, may not be actionable *per se*, unless *direct* application be made. *Sanderson v. Cadewell*, 45 N. Y. 398. Words charging an attorney with want of integrity, whether used generally of his profession or particularly as to some one transaction are actionable *per se*. *Garr v. Selden*, 6 Barb., 416. But a charge of ignorance or want of skill in a particular transaction is not usually actionable *per se*. *Garr v. Selden*, supra; *Foot v. Brown*, 8 Johns., 50. Among the more important imputations against a lawyer actionable *per se* are those charging him with dishonesty or breach of trust in regard to property of clients under his control, *Mains v. Whiting*, 87 Mich., 172; unfaithfulness generally to clients, *Hetherington v. Sterry*, 28 Kan., 426; *Chipman v. Cook*, 2 Tyler (Vt.) 456; cheating or swindling, *Rush v. Cavenaugh*, 2 Pa. St., 187; ignorance of the law, *Goodenow v. Tappan*, 1 Ohio, 60; falsely personating a constable, *McDermott v. Evening Journal Assoc.* 43 N. J. L., 488; giving erroneous and dishonest advice, *Ludwig v. Cramer*, 53 Wis., 193; offering to divulge client's secrets, *Riggs v. Denniston*, 3 Johns. Cas., 198; making extortionate charges for services, *Atkinson v. Detroit Free Press Co.*, 46 Mich., 341; charging two fees for same service, *Mosnat v. Snyder*, 105 Iowa, 500; being a "shyster," *Gribble v. Pioneer Press Co.*, 34 Minn., 342.

MUNICIPAL CORPORATIONS—INDEPENDENT CONTRACTORS—LIABILITY. FROELICH V. CITY OF NEW YORK, 93 N. E., 79 (N. Y.).—*Held*, that an independent contractor for the whole of an improvement for a city and a sub-contractor doing a part of the work are not servants or agents of the city reserving the right to supervise and inspect the work, and the city is not liable for the negligence where the plan for the work is reasonably safe, and there is no interference therewith by the city which results in injury.